

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	:	
	:	CRIMINAL ACTION
v.	:	
	:	05-10204-GAO
PAUL HICKS	:	

**JOINT MOTION TO CONTINUE TRIAL DATE OF JUNE 5, 2006**

The United States, by and through its attorneys, Michael J. Sullivan, U.S. Attorney for the District of Massachusetts and Nadine Pellegrini, Assistant U.S. Attorney, and Joseph Krowski, Jr., Esq., counsel for the Defendant Paul Hicks, hereby jointly file this motion requesting a continuance of the trial date in the above-captioned matter.

As basis therefore, the parties state that the following:

1. The parties have reviewed the docket and calculated that all time up until the currently scheduled trial date has been excluded by order of the court. Therefore, seventy (70) days remain before the case must be tried.

2. Additionally, the parties state there is an outstanding discovery issue which the parties are addressing and which will require further time in order to complete.

3. Finally, the parties state that they have agreed that all time between the current trial date and the continued date shall be excluded.

Therefore, the parties respectfully request a continuance of the trial in the above-captioned matter to a date at least thirty days from the current trial date on a date convenient to the court and to the parties.

Respectfully submitted,  
MICHAEL J. SULLIVAN  
United States Attorney

By:/s/ Joseph Krowski \_\_\_\_\_  
Joseph Krowski, Esq.,  
Counsel for the Defendant  
Paul Hicks

By: /s/Nadine Pellegrini  
  
Nadine Pellegrini  
Assistant U.S. Attorney